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Attorneys for Defendants

TLC RESIDENTIAL, INC., a corporation, and

FRANCISCO MONTERO, an individual

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

R. ALEXANDER ACOSTA,¹ Secretary of
Labor, United States Department of Labor,

Plaintiff,

v.

TLC RESIDENTIAL, INC., a corporation, and
FRANCISCO MONTERO, an individual.,

Defendants

Case No.: 15-cv-02776-WHA

**DECLARATION OF N. REBECCA A.
TURNER IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION FOR SUMMARY
ADJUDICATION**

Date: August 20, 2017

Time: 8:00 a.m.

Crtrm: 8-19th Floor

Trial Date: October 10, 2017

I, N. Rebecca A. Turner declare:

1. I am an attorney at law licensed to practice before all courts of the State of California. I am the principal of the law firm of Fog City Law Group, counsel for Defendants, and make this Declaration based on my own personal knowledge, except where otherwise so indicated. If called as a witness, I would competently testify to the following facts. I have reviewed all of the deposition transcripts and documents identified below.

2. Attached hereto as Exhibit 1 is a true and correct copies of the Declaration of Douglas Polcin, EdD MFT in Support of Defendants' Motion for Summary Judgment (Dkt No. 60).

3. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of Francisco Montero In Support of Defendants' Opposition to Plaintiff's Motion for Summary Adjudication (Dkt No. 97).

4. Attached hereto as Exhibit 3 is a true and correct copy of Declaration of Julie Bento in Support of Defendants' Motion for Summary Judgment (Dkt. Nos. 60, 97).

5. Attached hereto as Exhibits 4 and 5 respec are true and correct copies of Excerpts of the Transcripts of the Depositions of Francisco Montero, taken on December 5, 2014 and June 30, 2016.

6. Attached hereto as Exhibit 6 are true and correct copies of Excerpts of the Transcript of the Deposition of Douglas Polcin taken on August 22, 2016. (Dkt. No. 97)

5. Attached hereto as Exhibit 7 are true and correct copies of Excerpts of the Transcript of Deposition David Sheridan July 8, 2016. (Dkt No. 97).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 20th day of July 2017, at Napa, California.

/s/ N. Rebecca A. Turner
N. REBECCA A. TURNER

1 . On April 27, 2017 R. Alexander Acosta was appointed the Secretary of Labor. Pursuant to Fed. R. Civ. P. 25(d), Mr. Acosta is substituted as the Plaintiff in this action.